

# EXHIBIT G

## Mike Matesky

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**From:** Mike Matesky <mike@mateskylaw.com>  
**Sent:** Friday, March 20, 2020 4:51 PM  
**To:** 'Kelly Mennemeier'; 'Anne Cohen'; 'Nancy Stephens'; 'Ben Hodges'; 'Sheeba Roberts'; 'Michael Galletch'  
**Subject:** RE: ULC Monastery v. AMM Depositions & Discovery

Kelly,

I am not sure what you think I have misrepresented, but we sent you the amended deposition notice and an accompanying letter last week, and heard nothing back from you. This is the first time AMM has committed to proposing available deposition dates by today. I am certainly glad to hear it, and look forward to actually seeing those proposed dates (within the next hour or so, I suppose?). As we have maintained this whole time, we would prefer to work out mutually agreed deposition times, but have yet to see any effort to provide such dates from AMM. Indeed, a lot more effort seems to have gone into arguing why you do not have to cooperate with depositions at all. If AMM will finally meet us half-way and provide available deposition dates, that would be wonderful.

This is the first I have heard that AMM seeks to have two attorneys attend the deposition, but total attendance should be well under 10 people and we will ensure, with AMM's help, that all health and safety guidelines are followed. If you are actually (and not just rhetorically) asking for personal medical information of every attendee, I think you ought to provide some basis for that request. Of course, it will be easier to work these issues out if AMM does more than simply object and delay.

With regard to the depositions AMM wishes to take, I understand that you now only want us to provide dates on which deponents can be available for a full day of questioning. We will work on that.

Again, you have provided no response regarding AMM's minister numbers.

I look forward to receiving proposed deposition dates for AMM within the next hour or so.

Sincerely,  
Mike

Mike Matesky  
Matesky Law PLLC  
1001 4th Ave., Suite 3200  
Seattle, WA 98154  
Ph: 206.701.0331  
Fax: 206.701.0332  
[mike@mateskylaw.com](mailto:mike@mateskylaw.com)  
[www.mateskylaw.com](http://www.mateskylaw.com)



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**From:** Kelly Mennemeier [mailto:kelly.mennemeier@foster.com]

**Sent:** Friday, March 20, 2020 4:24 PM

**To:** 'Mike Matesky' <mike@mateskylaw.com>; 'Anne Cohen' <acohen@bpmlaw.com>; Nancy Stephens <nancy.stephens@foster.com>; Ben Hodges <ben.hodges@foster.com>; 'Sheeba Roberts' <sroberts@bpmlaw.com>; 'Michael Galletch' <mike@psbizlit.com>

**Subject:** RE: ULC Monastery v. AMM Depositions & Discovery

Mike,

I'm surprised by your email, which seriously misrepresents the understandings we reached in our prior call. You will be receiving possible dates and objections from us later today, as promised, but as discussed on the call, we will not be proceeding with a deposition on Monday. If you wish to move forward with a Motion to Compel, we will gladly brief ULC's conduct regarding this point to the Court.

Your continued insistence on trying to force a deposition right now needs to stop, and if it does not, we will be forced to file a Protective Order in which we will seek sanctions. You have not shown why this deposition needs to take place now, in the midst of a public health crisis that has all of King County ordered to practice social distancing and instructed not have events or meetings of any size unless multiple precautions have been taken. Despite knowing our objections to risking our health and our the health of our clients, you apparently refuse to delay this deposition. Yet you have not given a single indication that you can or will be following the King Country health guidelines (<https://kingcounty.gov/depts/health/communicable-diseases/disease-control/novel-coronavirus/events.aspx>) or that you have a location that complies with those guidelines (for instance, a space large enough that you will be 6 feet away from the witness and any co-counsel, that the court reporter will be 6 feet away from everyone, and that we will have the space to have 2 attorneys present and 6 feet apart from each other and from the witness, court reporter, and every attorney from your side, and that has been professionally cleaned on a daily basis in compliance with CDC standards). For that matter, if you have a court reporter willing to come to downtown King County, please tell us their name so we can ensure they have been screened and are healthy. Until we can be assured that all those guidelines and conditions are met, during the pendency of this crisis and in consideration of the current public health recommendations, we will not do any depositions.

As to your questions and refusal to give dates for depositions for witnesses for ULC, it is remarkable that you continue to stall on that while pushing so hard for a deposition of AMM that does not need to occur now. Out of professional courtesy to you, your client, and the witnesses, we do not currently plan to take depositions during this health crisis. However, we've sought the availability of witnesses in your control so that we can set tentative dates for once the crisis has subsided. You have yet to provide that information. Your questions are unnecessary for this purpose; simply give us dates that each of the witnesses is available, and if we determine that we can schedule more than one a day, we will do so. Nothing is preventing you from giving us these witnesses' full availability. As expressed, we hope and plan to set dates for those depositions for a time when we can comply with King County rules and ensure the safety of all involved, ideally after this public health crisis is over.

Kelly

**Kelly A. Mennemeier**  
**Attorney**

Foster Garvey PC

Tel: 206.447.4694  
[kelly.mennemeier@foster.com](mailto:kelly.mennemeier@foster.com)

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**From:** Mike Matesky [<mailto:mike@mateskylaw.com>]  
**Sent:** Friday, March 20, 2020 3:07 PM  
**To:** 'Anne Cohen'; Nancy Stephens; Ben Hodges; Kelly Mennemeier; 'Sheeba Roberts'  
**Cc:** 'Michael Galletch'  
**Subject:** ULC Monastery v. AMM Depositions & Discovery

Dear Counsel,

I am writing to follow up regarding depositions and discovery.

First, AMM has not provided any designees or proposed available dates for the 30(b)(6) deposition of AMM. As you know, the deposition is scheduled for this Monday, March 23, 2020. However, we just learned that the location identified in the deposition notice will not be available on Monday. We can still proceed, if you are amenable to hosting at one of your offices. If not, we ask that you please provide us alternative dates today.

Second, we have received no response to our questions (in our letter of March 12) regarding the twelve depositions AMM wishes to conduct. We can better respond to your request for available dates once you provide the information we have requested.

Third, AMM has still not confirmed whether it will produce its minister numbers, although it stated that it would do so during our telephone conference of March 6, 2020.

We look forward to your response as soon as possible.

Sincerely,  
Mike

Mike Matesky  
Matesky Law PLLC  
1001 4th Ave., Suite 3200  
Seattle, WA 98154  
Ph: 206.701.0331  
Fax: 206.701.0332  
[mike@mateskylaw.com](mailto:mike@mateskylaw.com)  
[www.mateskylaw.com](http://www.mateskylaw.com)



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